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each a Debtor and Debtor in Possession*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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|---------------------|-------------------------------------------|
| ----- | X |
| | : Chapter 11 |
| In re | : |
| | : Case No. 19-10747 (SHL) |
| JEFFREY LEW LIDDLE, | : |
| | : (Jointly Administered with Case No. 19- |
| Debtor | : 12346) |
| ----- | X |

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

| | |
|-----------------------------------------|-------------------------------------------|
| ----- | X |
| | : Chapter 11 |
| In re | : |
| | : Case No. 19-12346 (SHL) |
| LIDDLE & ROBINSON, L.L.P., ¹ | : |
| | : (Jointly Administered with Case No. 19- |
| Debtor | : 10747) |
| ----- | X |

NOTICE OF AGENDA FOR OMNIBUS HEARING

Time and Date of Hearing: September 19, 2019 at 10:00 a.m. (EDT)

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, before the Honorable Sean H. Lane, United States Bankruptcy Judge, **Room 701**, One Bowling Green, New York, NY 10004-1408

¹ The last four digits of Liddle & Robinson, L.L.P.'s taxpayer identification number are 6440.

PLEASE TAKE NOTICE that an agenda with respect to all matters set for hearing on **September 19, 2019 at 10:00 a.m. (EDT)** is set forth below. Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court's website at www.nysb.uscourts.gov, or (ii) contacting the Office of the Clerk of Court at One Bowling Green, New York, New York 10004. Note that a PACER password is required to access documents on the Court's website.

AGENDA

I. STATUS REPORT

II. DEBTOR JEFFREY LEW LIDDLE'S CONTESTED MATTERS

A. Settlement of Order Regarding Claim of Perfected Security Interest in and Lien on Certain Cash Collateral [**19-10747 ECF No. 170**]

1. **Related Documents:**

- (i) Proposed Order Denying Counsel Financial II LLC's Claim of a Perfected Security Interest in and Lien on Certain Cash Collateral and Granting Related Relief [**19-10747 ECF No. 171**]
- (ii) Counsel Financial II, LLC Objection to Proposed Order [**19-10747 ECF No. 172**]

2. **Status:** Going forward with respect to Jeffrey Lew Liddle.

III. DEBTOR LIDDLE & ROBINSON, L.L.P.'S CONTESTED MATTERS

A. Debtor's Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363 and 507, Rules 2002, 4001 and 9014 of the Federal Rules of Bankruptcy Procedure (1) Authorizing Use of Cash Collateral, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [**19-12346 ECF No. 5**]

1. **Related Documents:**

- (i) Debtor's Notice of Revised Budget for use of cash collateral with respect to Debtor's Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363 And 507, Rules 2002, 4001, and 9014 of the Federal Rules of Bankruptcy Procedure (1) Authorizing Use of Cash Collateral, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [**19-12346 ECF No. 23**]

- (ii) Objection to Motion by Debtor to (i) Extend Deadline to File Schedules, (ii) Use Cash Collateral, (iii) Retain Professionals, and (iv) Implement Procedures for Interim Compensation (related document(s) 3, 4, 5, 6, 7, 8, 9, 10) [19-12346 ECF No. 25]
 - (iii) Interim Order (1) Authorizing Use of Cash Collateral, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [19-12346 ECF No. 30]
 - (iv) Second Interim Order (1) Authorizing Use of Cash Collateral by Liddle & Robinson, LLP, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [19-12346 ECF No. 46]
 - (v) Proposed Third Interim Order (1) Authorizing Use of Cash Collateral by Liddle & Robinson, LLP, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [19-12346 ECF No. 73]
- 2. **Status:** Going forward on an interim basis with respect to Liddle & Robinson, LLP.
- B. Application of Debtor Pursuant to 11 U.S.C. § 327(a), Fed. R. Bankr. P. 2014(A) and 2016, and Local Rules 2014-1 and 2016-1 for Authority to Retain and Employ Foley Hoag LLP as Attorneys for the Debtor *Nunc Pro Tunc* to the Petition Date [19-12346 ECF No. 13]
 - 1. **Status:** Going forward with respect to Liddle & Robinson, LLP.
- C. Application of Debtor Pursuant to 11 U.S.C. § 327(a), Fed. R. Bankr. P. 2014(A) and 2016, and Local Rules 2014-1 and 2016-1 for Authority to Retain and Employ Richard J. Lynne as Tax Accountant to Liddle & Robinson LLP *Nunc Pro Tunc* to the Petition Date [19-12346 ECF No. 53]
 - 1. **Related Documents:**
 - (i) Objection by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC to Debtor's Application to Retain Richard J. Lynne [19-12346 ECF No. 70]
 - (ii) Objection by US Trustee for Region 2 (made in open court)
 - 2. **Status:** Going forward with respect to Liddle & Robinson, LLP.

- D. Application of Debtor Pursuant to 11 U.S.C. § 327(a), Fed. R. Bankr. P. 2014(A) and 2016, and Local Rules 2014-1 and 2016-1 for Authority to Retain and Employ The Benefit Practice as Benefits Consultant to Liddle & Robinson LLP *Nunc Pro Tunc* to the Petition Date [19-12346 ECF No. 58]

1. **Related Documents:**

- (i) Objection by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC to Debtor's Application to Retain The Benefit Practice [19-12346 ECF No. 69]

2. **Status:** Going forward with respect to Liddle & Robinson, LLP.

IV. DEBTOR JEFFREY LEW LIDDLE'S ADJOURNED ITEMS

- A. VW Credit, Inc.'s Motion for Relief from Automatic Stay Pursuant to 11 U.S.C. Section 362(d)(1) & (2) [19-10747 ECF No. 77]

1. **Status:** Motion has been adjourned by consent of all parties until the next omnibus hearing to be scheduled.

- B. Motion by M&T Bank for Relief from Stay re: 560 Main Street, Southampton Town, NY 11978 [19-10747 ECF No. 107]

1. **Related Documents:**

- (i) Memorandum of Law in Support of Motion for Relief from Stay re: 560 Main Street, Southampton Town, NY 11978 [19-10747 ECF No. 108]

2. **Status:** Motion has been adjourned by consent of all parties until the next November omnibus hearing to be scheduled.

- C. Objection by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC to Debtor's Claims of Exempt Property Pursuant to Bankruptcy Rule 4003 [19-10747 ECF No. 118]

1. **Related Documents:**

- (i) Notice of Hearing to Consider Objection to Debtor's Claim of Exempt Property [19-10747 ECF No. 119]

2. **Status:** Motion has been adjourned by consent of all parties until the next omnibus hearing to be scheduled.

D. Motion by Michael Barr for Relief from Stay re: NY State Court Action against Liddle & Robinson LLP [19-10747 ECF No. 168]

1. **Related Documents:**

(i) Affirmation in Support of Motion for Relief from Stay [19-10747 ECF No. 169]

2. **Status:** Motion has been adjourned by consent of all parties until the November omnibus hearing to be scheduled.

V. **DEBTOR LIDDLE & ROBINSON, L.L.P.'S ADJOURNED ITEMS**

A. Motion by Michael Barr for Relief from Stay re: NY State Court Action against Liddle & Robinson LLP [19-12346 ECF No. 54]

1. **Related Documents:**

(i) Affirmation in Support of Motion for Relief from Stay [19-12346 ECF No. 55]

2. **Status:** Motion has been adjourned by consent of all parties until the November omnibus hearing to be scheduled.

Dated: New York, New York
September 17, 2019

FOLEY HOAG LLP

By: /s/ William F. Gray, Jr.

William F. Gray, Jr.

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